

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: DANIEL J. FERST : CHAPTER 13  
TARA M. FERST : NO. 17-13720JKF

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Debtors, Daniel J. and Tara M. Ferst, have filed a Motion to Modify Chapter 13 Plan After Confirmation with the court requesting the Court modify their Chapter 13 Plan.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT AN ATTORNEY.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **February 23, 2020**, you or your attorney must do **ALL** of the following.

- (a) File an Answer explaining your position at

**UNITED STATES BANKRUPTCY COURT  
4TH FLOOR CLERKS OFFICE  
900 MARKET STREET  
PHILADELPHIA, PA 19107**

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) Mail a copy to the debtor's attorney:

**MUDRICK & ZUCKER, P.C.  
325 SENTRY PARKWAY  
BUILDING 5W, SUITE 320  
BLUE BELL, PA 19422**

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the **HONORABLE JEAN K. FITZSIMON** on **March 4, 2020** at **9:30 A.M.** in Courtroom #3, United States Bankruptcy Court, 2nd Floor 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an Answer.

Dated: 2/03/2020